

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

UNITED STATES OF AMERICA <i>ex rel.</i>	)	
BROOK JACKSON,	)	
	)	
Relator,	)	Civil Action No.: 1:21-cv-00008-MJT
	)	
v.	)	
	)	<b>UNOPPOSED MOTION TO AMEND</b>
VENTAVIA RESEARCH GROUP, LLC;	)	<b>BRIEFING SCHEDULE</b>
PFIZER INC.; ICON, PLC,	)	
	)	
Defendants.	)	
_____	)	

Now comes Brook Jackson, through undersigned counsel, who moves this Court for additional time to respond to Defendants' pending motions to dismiss, and to amend other deadlines per the proposed order attached hereto and incorporated herein.

Defendants filed their Motions to Dismiss on October 20, 2023, making Relator's response brief(s) due on or before November 3, 2023. Specifically, Relator requests to extend the present deadline to file her response to Defendants' Motions to Dismiss to December 1, 2023.

Relator has conferred with Defendants and they are unopposed to a 28-day extension of Relator's deadline for responding to their motions to dismiss, so long as the Court is also willing to extend other upcoming deadlines by the same amount of time, as reflected in the attached proposed order.

Respectfully Submitted,

/s/ Lexis Anderson

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Attorneys for Relator *Brook Jackson*

**CERTIFICATE OF SERVICE**

A copy of the foregoing has been sent by the Court's Electronic Filing System to all parties of record on November 1, 2023.

/s/ Lexis Anderson  
Lexis Anderson

### **CERTIFICATE OF CONFERENCE**

Relator, through undersigned counsel, files this Certificate of Conference to verify that Relator's Counsel has complied with the meet and confer requirement in Local Rule CV-7(h). On October 30, 2023, Counsel for Relator contacted Counsel for Defendants Ventavia Research Group, LLC, Icon, PLC, and Pfizer, Inc. and informed them of Relator's intent to file her motion for reconsideration. All Defendants stated that they were unopposed to the motion.

Dated: November 1, 2023

Respectfully submitted,

/s/ Lexis Anderson

Lexis Anderson, Esq.

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VENTAVIA RESEARCH GROUP, LLC;	)	
PFIZER INC.; ICON, PLC,	)	
	)	
Defendants.	)	

**[PROPOSED] ORDER AMENDING BRIEFING SCHEDULE**

Upon consideration of Relator's Unopposed Motion to Amend Briefing Schedule, and the entire record, it is hereby ORDERED that the Motion is GRANTED and the below deadlines are amended as set forth below:

Motions to Dismiss	October 20, 2023
Opposition(s) to Motions to Dismiss:	December 1, 2023
Replies in Support of Motions to Dismiss:	December 8, 2023

Absent further order of the Court, all other deadlines remain unchanged.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Michael J. Truncale  
United States District Judge